



DEPARTMENT OF THE NAVY
SOUTHERN DIVISION
NAVAL FACILITIES ENGINEERING COMMAND
2144 MELBOURNE ST., P. O. BOX 10068
CHARLESTON, S. C. 29411

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1984 MAY 14 PM 1:17

PLEASE ADDRESS REPLY TO THE
COMMANDING OFFICER, NOT TO
THE SIGNER OF THIS LETTER.
REFER TO:

TEL. 803-743-5510 SUPERFUND BRANCH

Code 1142

10 MAY 1984

Mr. Samuel L. Nott, Chief
Superfund Branch
Environmental Protection Agency
Region VI
InterFirst Two Building
1201 Elm Street
Dallas, TX 75270

SUPERFUND FILE

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REORGANIZED

Subj: NACIP CONFIRMATION STUDY AND SUMMARY OF REMEDIAL ACTION, NAVAL WEAPONS
INDUSTRIAL RESERVE PLANT, MCGREGOR, TEXAS, AUGUST 1983

Dear Mr. Nott:

MCGREGOR NAVAL WEAPONS
TX9670024708

We appreciate your comments provided through your correspondence of 10 April 1984 regarding the NACIP Confirmation Study and Summary of Remedial Action at the Naval Weapons Industrial Reserve Plant, McGregor, Texas. Relative to your comments, we would like to offer the following information:

1. The sampling conducted in 1979 which indicated low DDT contamination levels at 24" and 42" (1.9 ppm and 3.9 ppm respectively) involved digging a large trench in the ground with a backhoe. It was very likely that some surface material was blown into the trench prior to sampling, thereby compromising the accuracy of that portion of the study. Of course, most importantly, the trench sampling did confirm that there were no high grade DDT deposits below 12". This was confirmed by subsequent sampling in September 1982 and April 1983 which was provided as part of the subject Confirmation Study.

2. After removing and/or biologically treating the top 12" of soil and reducing pesticide levels to below 1 ppm, sampling below the contaminated region will be conducted to insure that contamination levels are below 1 ppm. This approach has already been approved by the Texas Department of Water Resources (TDWR). Additionally, and as you have requested, a groundwater monitoring program will be initiated as part of the cleanup to insure that no groundwater contamination has occurred.

3. Because the asbestos site is one of the most plushly vegetated areas on the entire activity (the asbestos lightens the soil, holds water, and generally promotes the growth of native chapparel and grasses), it is felt that covering the site with local topsoils will be quite satisfactory. The vermiculite like asbestos subbase will stimulate vegetative growth which in turn will stabilize the area and prevent erosion. The area will be carefully sloped to minimize erosion.

4. The less contaminated soil in Area G will, based on economic considerations, either be removed to a permitted hazardous waste disposal site off station or biologically degraded in place.

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Regarding remedial measures, Ciba-Giegy Corporation, the party responsible for the pesticide contamination, has agreed to initiate total cleanup in Area G to the satisfaction of the Navy and the TDWR within 45 days. A draft copy of the consent agreement between the U. S. Government and Ciba-Giegy is enclosed. Also, the Navy has recently authorized funding to secure the asbestos site as required by TDWR to be accomplished no later than 1 October 1984. We are pleased that corrective action will soon be underway at both sites and that at least one of the private parties responsible will be accomplishing cleanup.

A final report from Shannon-Wilson will be received in our office within a month. We will forward you a copy under separate cover as soon as it is received. We hope that these comments will clarify our remedial action plan and that we have your concurrence.

Sincerely,



D. R. SPELL, P.E.
Head, Environmental Branch

Encl:
Consent Agreement

Copy to:
COMNAVAIRLANT (Booth)
Hercules, Inc. (Kathleen Anglin)
Dept. of Justice (Andy Hogeland)